

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PEARSON EDUCATION, INC., MCGRAW-HILL
GLOBAL EDUCATION HOLDINGS, LLC, JOHN
WILEY & SONS, INC., ELSEVIER, INC., and
CENGAGE LEARNING, INC.,

Case No. 16-cv-1244-PAE

Plaintiffs,

v.

FADI JABBER, AMMAR JABER, AHMAD
BRHAM, and DOES 1 – 11 d/b/a www.testbank-
for.com, www.instructor-resources.com,
www.testbank-resources.com, www.testbank-
ebooks.com, www.testbank-testbank.net,
www.testbanktestbank.com, www.university-
testbank.com, www.testbank-sales.com, and
www.testbankexpert.com,

Defendants.

**STIPULATION FOR ENTRY OF JUDGMENT AND
PERMANENT INJUNCTION AGAINST DEFENDANTS**

On February 18, 2016, Plaintiffs Pearson Education, Inc., McGraw-Hill Global Education Holdings, LLC, John Wiley & Sons, Inc., Elsevier, Inc., and Cengage Learning, Inc. (“Plaintiffs”) filed this action against Defendants Fadi Jabber, Ammar Jaber, Ahmad Brham, and Does 1-11 d/b/a www.testbank-for.com, www.instructor-resources.com, www.testbank-resources.com, www.testbank-ebooks.com, www.testbank-testbank.net, www.testbanktestbank.com, www.university-testbank.com, www.testbank-sales.com, and www.testbankexpert.com (collectively, “Defendants”), asserting a claim for copyright infringement. Plaintiffs and Defendants have agreed to settle this action and have entered into a

formal written Settlement Agreement, the terms of which require, among other things, that Defendants agree, stipulate, and consent to: (1) entry of a Final Judgment and Permanent Injunction in a form substantially similar to the attached Exhibit A; (2) transfer of the funds in Defendants' PayPal and Payoneer accounts, which have been restrained pursuant to this Court's Order of February 22, 2016 (ECF No. 13), to Plaintiffs through their counsel; and (3) transfer of the testbank-for.com, instructor-resources.com, testbank-resources.com, testbank-ebooks.com, testbank-testbank.net, testbanktestbank.com, university-testbank.com, testbank-sales.com, and testbankexpert.com domain names to Plaintiffs.

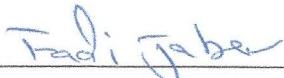
Stipulated and agreed by the parties:

OPPENHEIM + ZEBRAK LLP
on behalf of Plaintiffs


Name: Scott A. Zebrak Dated: 4/7/16

Title: Principal, Oppenheim + Zebrak, LLP
Senior Counsel

FADI JABER


Dated: 3/3/2016

AMMAR JABER


Dated: 3/3/2016

AHMAD BRHAM


Dated: 3/3/2016